

DRAWING AMENDMENTS

Please amend the drawing figure in accordance with the Revised Format of Amendments under 37 C.F.R. § 1.121.

A proposed drawing correction is submitted wherein numeral "48" has been added to Figures 2 and 3 in place of the mistakenly used numeral "68" in those two figures. Further, a proper "Replacement Sheet" is submitted herewith.

1 **REMARKS**

2 The Applicant respectfully requests reconsideration and Allowance of Claims 1-20 in
3 view of the amendments presented above and the following arguments.

4 **DRAWING OBJECTIONS**

5 The drawings were objected to for not showing the "barrel bolt" and the "split bolt". As
6 set forth below in the response to the 112 rejections, Applicant respectfully submits that both
7 the single barrel bolt 42 and the split bolt 42 are adequately shown and described in Figures
8 1-3 , for example and the indicated parts of the specification such that a person of ordinary skill
9 in the art can practice the invention.(See eg, page 10, lines7-15) As a result, Applicant
10 respectfully requests that the objection to the drawings on these grounds be withdrawn.

11 **CLAIM OBJECTIONS**

12 Claims 1-17, 19, and 20 were objected to for informalities. These informalities have
13 been addressed by amendments to the claims as suggested by the Examiner. As a result,
14 Applicant submits that these informalities have been properly corrected and Applicant
15 respectfully requests that the objections to these claims on these grounds be withdrawn and
16 the claims allowed.

17 **35 U.S.C. §112 REJECTIONS**

18 Claims 2, 3, and 10 were rejected under 35 U.S.C. 112 for failing the enablement
19 requirement. Specifically, the Examiner stated "it is not clear what is meant by 'barrel bolt' or
20 'split bolt' or how the recited structure affects function of invention whereby one of ordinary skill
21 in the art could not [sic] make and use the claimed invention" (Page 3, paragraph 5 of the Office
22 Action).

1 Referring to the application, Applicant has clearly described that bolt 42 may be a single
2 bolt or a combination of two bolts, a split bolt as so described. See for example, page 10, lines
3 6-9 which state "As illustrated in Figures 1, 2 and 3, according to one embodiment, bolt 42 is
4 a barrel bolt and according to another embodiment of the invention, the bolt is a split bolt,
5 meaning a bolt in at least two parts." Applicant respectfully submits that the information
6 Applicant has provided in the figures and description is fully sufficient to enable a person of
7 ordinary skill in the art to practice the invention as claimed. As a result, Applicant respectfully
8 requests that the rejection of these claims under these grounds be withdrawn and the claims
9 allowed.

10 **35 U.S.C. §102 REJECTIONS**

11 Claims 1-3, 5, 7-12, 14, 15, 17, and 18 were rejected under 35 U.S.C. §102(b) as
12 anticipated by Cannell U.S. Pat. No. 3,752,518.

13 Claims 2-5, 7-12, 14, and 15-19 were rejected under 35 U.S.C. §102(b) as anticipated
14 by Sweet U.S. Pat. No. 5,340,172. [Note: The Examiner's Office Action actually identifies claims
15 "-5,... ." but the Examiner addresses claims 2-4 in his remarks and Applicant believes, therefor,
16 that the Examiner meant to identify claims "2-5,... ." in the Office Action on Page 5, at the start
17 of paragraph 8.]

18 Applicant respectfully submits that the invention as now claimed is not taught or
19 suggested by the cited art as set forth more fully herein below.

21 **STATUS OF THE CLAIMS**

22 Claims 1-20 remain pending in this case.

1 Claims 6, 13, and 20 have been identified as allowable if rewritten in independent form.
2 Because of the amendments above and the arguments presented below, however, these claims
3 are believed to be allowable as originally presented.
4

5 **CLAIMS 1, 9, 15, 18 ARE NOT TAUGHT OR SUGGESTED BY THE CITED ART**

6 The Examiner rejected independent Claims 1, 9, 15, 18 under 35 U.S.C. §102(b) as
7 anticipated by U.S. Patent 3,752,518 to Cannell. Applicant respectfully traverses this rejection
8 on the ground that Cannell does not describe or suggest Applicant's invention as now claimed.
9

10 **THE CANNELL PATENT**

11 The Cannell patent discloses a door bolt for mounting on the inner surface of a door
12 in a doorway arranged to direct a pair of bars 16 outwardly into openings 18 in the door casing
13 17.(Column 1, lines 19-21 and Column 2, lines). The mount of Cannell is attached to the
14 movable structure, the door 11, as shown in the figure, by brackets identified as " mounting
15 brackets" 12. Cannell does not teach or suggest attaching the mounting brackets to the
16 nonmovable structure.

17 Cannell does disclose that the openings 18 may extend into the wall itself (Column 2,
18 line 1) but openings 18 are holes drilled, preferably, in the door casing 17 that must weaken the
19 structure , the casing and/or the wall, as is common in the prior art devices as discussed in
20 Applicant's specification. In fact this particular prior art "solution" was know to the Applicant and
21 its weakness identified in the specification at page 2, lines 11-19 as follows:

22 "This problem is known in the art and some security devices are designed to attach the
23 movable structure to the nonmovable structure by means of a dead bolt, for example, from the

1 door through the door frame into the nonmovable structure, or wall, of the house. In the ordinary
2 situation, this requires the drilling of a hole in the door frame and into the wall so as to provide
3 an opening to receive the dead bolt. While an improvement upon a connection to the door
4 frame, the drilling of the hole necessarily weakens the vital center of the door frame and the
5 surrounding wall and does nothing to strengthen the door itself.”

6 Again, nothing in Cannell teaches a mount attached to nonmovable structure on
7 each side of the movable structure wherein the mount is conformed to receive the bolt
8 on each side of the movable structure, as required in each of the independent claims of
9 Applicant’s invention.

10 With regard to Examiner’s stated position that “nonmovable structure” means the wall
11 and its inherent framing, Applicant respectfully disagrees. Applicant specifically stated that the
12 prior art solutions included use of bolts into the door frames. These are known to be inadequate
13 since the door frames are only minimally connected to the nonmovable structure. (See page
14 2, lines 5-10 as follows:

15 “Because the door frame is only minimally attached to the nonmovable structure, i.e. the
16 house, any connection from the door to the door frame is very little security in reality. That is
17 to say, the door frame provides very little sturdy, secure, purchase area for what ever security
18 device is attached to it. As a result, a determined kick can break through most of the chains,
19 locks, and so forth connected from the movable structure, the door, to the door frame, for
20 example.”)

21 Further, Applicant has identified the nonmovable structure 14 as a wall for example.
22 (See eg page 6, line 4). As is consistent with this definition, Figure 1, shows nonmovable
23 structure 14 separate and apart from door frame 38 and movable structure 12, the door. In this

1 light, the requirement of the independent claims for a mount attached to nonmovable structure
2 on each side of the movable structure wherein the mount is conformed to receive the bolt on
3 each side of the movable structure is very clearly not shown or suggested by Cannell.

4 The Applicant therefore respectfully submits that independent Claim 1, as well as
5 independent Claims 9, 15 and 18 which require limitations similar to those in Claim 1, are not
6 anticipated by, nor obvious over, Cannell and are entitled to allowance along with dependent
7 claims 1-8; 10-14; 16-17 and 19-20 respectively.

8 **THE SWEET PATENT**

9 Applicant respectfully submits that the Sweet patent also does not disclose or suggest
10 Applicant's invention as now claimed for the same reasons set forth above with regard to
11 Cannell and for the following additional reasons.

12 Sweet discloses securing inward opening doors by mounting a security bar on opposing
13 hinges and for outward opening doors by mounting brackets securely fastened to the door jam
14 material. (Abstract).

15 Applicant also specifically identified this prior art "solution" as inadequate in the
16 specification at page 2 , line 20-23 and page 3, lines 1-6 as follows:

17 "A still further problem with the prior art solutions is that even if an adequate dead bolt
18 is provided so that some increased security is achieved, the fact is that another major weakness
19 exists in all movable structures attached to the nonmovable structure in the normal accepted
20 manner. In the typical case, the movable structure, i.e. the door, is attached to the door frame
21 such that the door moves open and shut on a set of two or three hinges. While the hinges are
22 necessary to provide ease of movement, they add another high-level of the vulnerability to the

1 inhabitants. Here again, a determined kick on the hinged side of the movable structure is
2 usually enough to break the door free from the door frame and allow an intruder access.”

3 Nothing in Sweet discloses or even suggests securing the bolt receiving mounts to the
4 nonmovable structure on each side of the movable structure as required by Applicants claims.
5 Applicant respectfully submits, therefore, that independent claims 1, 9, 15, and 18 along with
6 the claims dependent therefrom are allowable as now presented.

7
8 **CITED BUT NON-APPLIED REFERENCES**

9 The subsidiary references have been reviewed but are submitted to be less relevant
10 than the relied upon references.

1 **CONCLUSION**

2 In light of the above, Applicant respectfully requests reconsideration and allowance of
3 Claims 1-20. If the Examiner should feel that any issue remains as to the allowability of these
4 claims, or that a conference might expedite allowance of the claims, the Examiner is asked to
5 telephone the undersigned attorney.

6 Applicant intends this to be a complete response. No fee is believed due; however if a
7 fee is due, please charge the deposit account number indicated on the transmittal letter.

8 Respectfully submitted,

9
10 J. Nevin Shaffer, Jr., P.A.

11
12 Date: 5 Oct 04

13 By: 

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18 **Certificate of Mailing**

19 I hereby certify that this correspondence is being deposited with the United States Postal Service with sufficient
20 postage as first class mail in an envelope addressed to: Mail Stop Amendment, Commissioner for Patents, P. O. Box
21 1450, Alexandria, VA 22313-1450.

22 Date of Deposit: OCT 5, 2004

23 Reg. No. 29,858, J. Nevin Shaffer, Jr. 



Title: CROSS CONNECTING STOP APPARATUS AND METHOD

Inventor: Michael A. Grillo
Date of Deposit: 25 June 2003
Atty. Dkt. No.: 100-1229

2/3

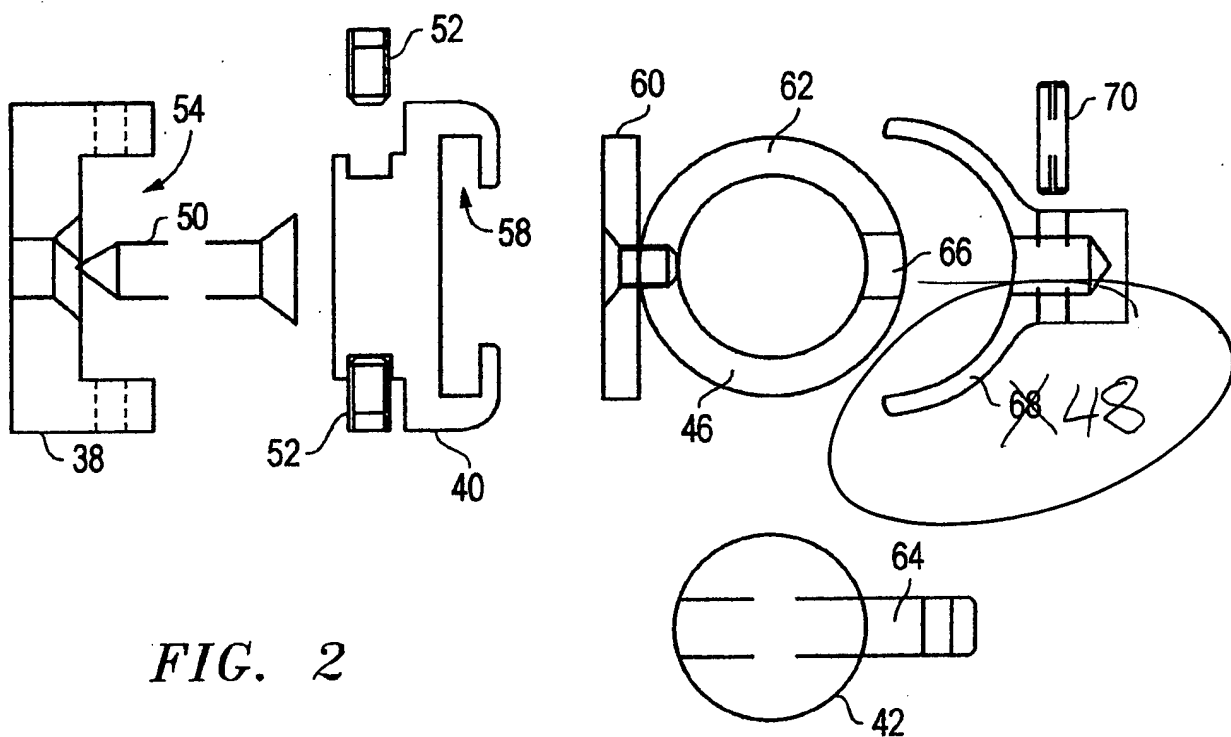


FIG. 2

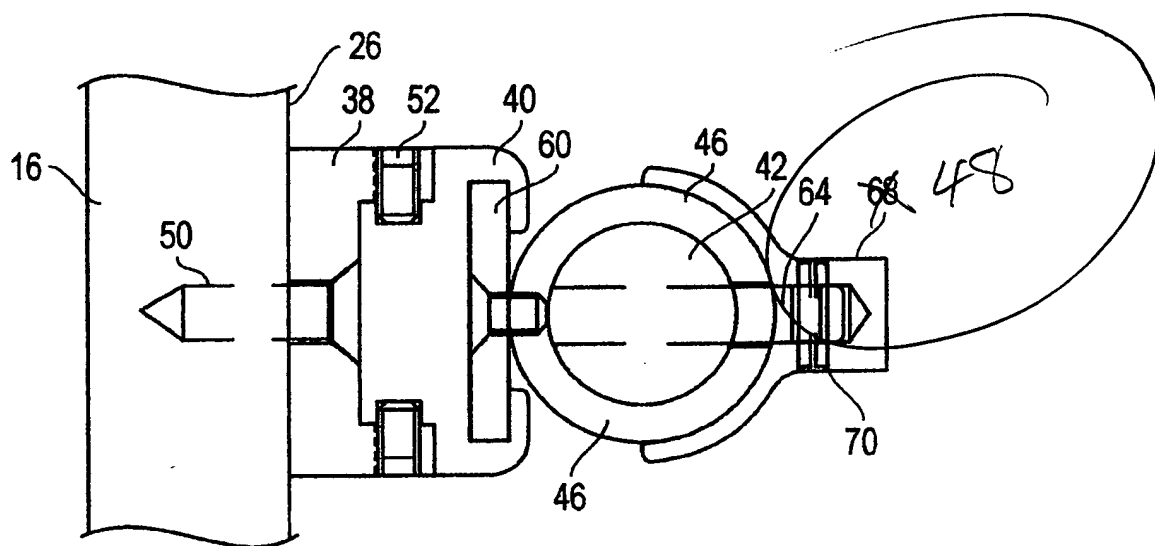


FIG. 3